

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

MAR 20 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

SHAHID NADEEM and  
SAAD NADEEM

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§

CRIMINAL NUMBER:

19 CR 213

INTRODUCTION

**Introduction**

1. A trademark (mark) is a word, name, symbol, or device or any combination of such items, that is intended to distinguish one producer's goods from those of other producers and to indicate the source of the goods.

2. A counterfeit mark is a spurious mark that is identical with, or indistinguishable from, a mark registered on the principal register in the United States Patent and Trademark Office (USPTO) and in use, whether or not the defendant knew such mark was so registered.

3. A good is counterfeit, if connected to a counterfeit mark though it does not require actual confusion.

4. The companies listed in this indictment registered trademarks on the principal register of the USPTO for use on handbags, wallets, belts, watches and other goods. These companies marked their products, as listed below, with their registered trademarks to distinguish them from their competitors' products and to assure the public of their quality. At no time did any of the companies listed in this indictment authorize, ratify, or acquiesce to the use of their trademarks by the defendants, nor did any other person have the power to do so.

COMPANY	TRADEMARK REGISTRATION NO.	DESCRIPTION
Louis Vuitton Malletier (Louis Vuitton)	1,990,760 4,192,541 2,773,107 2,181,753 2,177,828 1,519,828 2,346,373	"Louis Vuitton" word mark "LV" and Flower Mark Louis Vuitton Flower Mark Louis Vuitton Flower Mark Louis Vuitton Flower Mark "LV" Company Initials Mark LOUIS VUITTON PARIS
Michael Kors	2,520,757 3,438,412	Michael Kors Word Mark "MK" Company Initials Mark
Coach, Inc. (Coach)	1,071,000 1,070,999 4,296,584 2,983,654 3,696,470 3,441,671 3,338,048 2,088,707	"Coach" Word Mark Coach Lozenge Coach stylized font Coach with rectangles Op Art "CCCC" Coach Horse and Carriage Coach Story Patch Coach hangtag
Gucci America, Inc. (Gucci)	3,376,129 3,072,549 3,378,755 1,122,780 86,106,818	Gucci Interlocking Opposing GG monogram Gucci Opposing "GG" (one upside down) Gucci Opposing "GG" (one upside down) Gucci green/red/green Stripe Pattern "Gucci" Word Mark
Chanel	1734822 74242471 1733051 74242426	Chanel CC Chanel CC Serial Number Chanel Chanel Serial Number
Burberry	260843 1133122 3879249 4702550  1241222 2022789 3529814  863179 2512119	BURBERRY trademark     BURBERRY CHECK Trademark  EQUESTRIAN KNIGHT DEVICE trademark
Armani Exchange	2726789 76403436	Armani Mark Armani Serial number
Versace	2980455 76536034	Versace Medusa Head logo
Salvatore Ferragamo	73796739 1609161	Ferragamo Mark Ferragamo Serial number

Rolex	0101819 71078904 0657756 72027385	Rolex  Crown device IC 014RolexRolex
Prada	2504023 76155482 2135219 75042102 1264243 73223768 2162795 75185423	PRADA IC 003 PRADA IC 009, 014 PRADA IC 018 PRADA IC 018, 025

5. The allegations set forth in paragraphs one through four of this Indictment are re-alleged and incorporated as though set forth in full in Counts 1 through 4.

**COUNT I  
CONSPIRACY TO TRAFFIC IN  
COUNTERFEIT GOODS  
18 USC 371**

6. Beginning on or around June 2014 and continuing through the present, in the Southern District of Texas, and elsewhere, defendants,

**SHAHID NADEEM  
and  
SAAD NADEEM,**

did conspire with each other and others, known and unknown to the Grand Jury, to intentionally traffic in goods, such as handbags, belts and watches to which a counterfeit mark was applied, such as that of Louis Vuitton, Michael Kors, Coach, Gucci, Rolex and other brand named goods, and did knowingly use in connection with such goods, counterfeit marks substantially indistinguishable from those listed in paragraph four (4) of the indictment, the use of which was likely to cause confusion, to cause mistake, and to deceive. All in violation of Title 18 U.S.C. section 2320(a)

### **MANNER AND MEANS**

7. SHAHID NADEEM, SAAD NADEEM, and others ordered counterfeit goods from China, that is, goods with marks and identification symbols designed with the potential to deceive or cause confusion.

8. SHAHID NADEEM and SAAD NADEEM ordered goods from China using false business addresses and placed the counterfeit goods in storage facilities in the Southern District of Texas and outside the Southern District and State of Texas.

9. SHAHID NADEEM and SAAD NADEEM sold goods, which bore counterfeit marks that were substantially indistinguishable from genuine marks registered with the USPTO by companies, such as those listed in paragraph (4).

10. SHAHID NADEEM and SAAD NADEEM collected money from the sale of counterfeit goods and transferred the money to accounts outside the United States in order to make additional purchases of counterfeit goods.

### **OVERT ACTS**

a. On or about April 1, 2014, counterfeit goods from China bound for addresses associated with Saad Nadeem and Shahid Nadeem in the Southern District of Texas were seized.

b. On or about August 7, 2014, defendant Saad Nadeem sent an email from saad22071997 providing a photo of an “MK” logo and requesting a company in China manufacture counterfeit handbags.

c. On or about June 15, 2014, Saad Nadeem sent an e-mail from saad22071997 to a company in China, which requested “tags or metal logos of MK.”

d. On or about May 14, 2015, Saad Nadeem sent an e-mail from saad22071997 to a leather company outside the United States, which stated “Do you have copy brands?”

e. On or about December 15, 2015, Saad Nadeem sent an e-mail from saad22071997 to a company in China, which stated “could you guys ship copy items too?”

f. In or around November 2015, Shahid Nadeem recruited N.S. to sell counterfeit goods for him.

g. On or about June 2016 to June 2017, Saad Nadeem rented over (10) storage units in the Southern District of Texas.

h. On or about July 18, 2016, Saad Nadeem rented a storage unit in Missouri City, which received over 100 shipments from China.

i. On or about June 6, 2016, a conspirator using e-mail address maryam2908199 sent a request to a wholesale company, which stated "Hello I am interested in buying some branded fake bags. I live in USA and I have a wholesale business. It would be great if you can tell me the brands you have and the different variety in it."

j. On or about December 22, 2016, Shahid Nadeem transferred \$10,000 to a company in China.

k. On or about December 30, 2016, a company in China confirmed an order of goods from Shahid Nadeem.

l. On or about January 4, 2017, counterfeit goods bound for addresses in the Southern District of Texas associated with Saad Nadeem and Shahid Nadeem were seized.

m. On or about March 30, 2017, Shahid Nadeem and Saad Nadeem imported counterfeit Rolex watches into the United States from China.

n. On or around March 2017 to June 2017, Saad Nadeem rented storage units in Dallas, Austin, Louisiana, and Mississippi.

o. In or around April 2017 to June 2017, Shahid Nadeem and others rented five (5) Penske moving trucks using e-mail address maryam2908199 in the Southern District of Texas.

p. On or about May 23, 2017, Saad Nadeem transported handbags from a storage facility to 5800 Corporate Drive, Southern District of Texas, where Shahid Nadeem was located.

q. On or about December 5, 2017, A.F purchased over sixty (60) counterfeit handbags from Saad Nadeem and Shahid Nadeem at 5800 Corporate Drive, Southern District of Texas.

r. From in or around January 2014 to present, Saad Nadeem and Shahid Nadeem received over 3000 shipments from China.

s. From in or around January 2014 to present, Saad Nadeem and Shahid Nadeem had over 130 shipments of counterfeit goods seized with a value of over \$14,000,000.

In violation of Title 18, United States Code, Section 371.

**COUNT II**  
**Aiding Trafficking in Counterfeit Goods**  
**18 U.S.C. § 2320(a)(1)**

On or about March 30, 2017, in the Southern District of Texas, and elsewhere, the  
defendants,

**SHAHID NADEEM**

**and**

**SAAD NADEEM,**

did intentionally aid and abet the trafficking of goods, that is, Rolex watches, and in connection with such goods, knowingly used counterfeit Rolex marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.

**COUNT III**  
**Aiding Trafficking in Counterfeit Goods**  
**18 U.S.C. § 2320(a)(1)**

On or about December 5, 2017, in the Southern District of Texas, and elsewhere, the  
defendants,

**SHAHID NADEEM**

**and**

**SAAD NADEEM,**

did intentionally aid and abet the trafficking in goods, that is, handbags and wallets, and in connection with such goods knowingly used counterfeit Louis Vuitton, Versace, Michael Kors, Armani and other marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.

**COUNT IV**  
**Aiding Trafficking in Counterfeit Goods**  
**18 U.S.C. § 2320(a)(2)**

On or about January 4, 2017, in the Southern District of Texas, and elsewhere, the  
defendants,

**SHAHID NADEEM**

**and**

**SAAD NADEEM,**

did intentionally aid and abet the trafficking in goods, that is, handbags, and in connection with such goods knowingly used counterfeit Louis Vuitton, Chanel, Burberry, and Gucci marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.



**NOTICE OF FORFEITURE**

18 U.S.C. § 2323

Pursuant to Title 18, United States Code, Section 2323(b)(1), the United States gives notice to defendants,

**SHAHID NADEEM**

**and**

**SAAD NADEEM,**

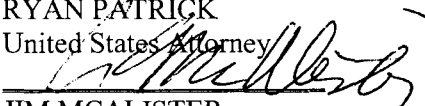
that upon conviction for a violation of Title 18, United States Code, Sections 371 and 2320(a), as alleged in Count One of this Indictment, the United States intends to seek forfeiture of the property described in Count One of this Indictment and any and all articles, the making or trafficking of which is prohibited under Section 2320; any property used, or intended to be used, in any manner or part to commit or facilitate the commission of such offense; and all property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

**MONEY JUDGMENT AND SUBSTITUTE ASSETS**

The United States will seek the imposition of a money judgment against defendants Shahid Nadeem and Saad Nadeem. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of defendants, Shahid Nadeem and Saad Nadeem, in substitution up to the total value of the property subject to forfeiture.

A TRUE BILL

ORIGINAL SIGNATURE ON FILE  
FOREPERSON

By:   
RYAN PATRICK  
United States Attorney  
JIM MCALISTER  
Assistant United States Attorney